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Attorneys for Defendant

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

AARON SENNE, *et al.*,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL, and unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, *et al.*

Defendants.

Case No. 3:14-cv-00608 JCS (consolidated
with 3:14-cv-03289-JCS)

**DECLARATION OF ADAM TYHURST,
CONTROLLER, ATHLETICS
INVESTMENT GROUP LLC**

DECLARATION OF ADAM TYHURST - Case No. 3:14-cv-00608 JCS (consolidated with 3:14-cv-03289-JCS)

1 I, Adam Tyhurst, declare as follows:

2 1. I am employed as the Controller for Athletics Investment Group LLC (d/b/a
3 “Oakland Athletics”), a Major League Baseball Club (the “Oakland Athletics” or the “Club”). As
4 Controller, my responsibilities include overseeing payroll for minor league players. I have
5 personal knowledge of the facts contained in this declaration, and have provided the information
6 below based on my review of certain documents and information. If called to testify, I could and
7 would testify competently thereto.

8 2. I reviewed the payroll records that the Club has produced in connection with this
9 action (bearing Bates Numbers OAK0010353 – OAK0010354; OAK0010246), and it is my
10 understanding that such records were kept by the Club in the normal course of business.

11 3. In the produced payroll records referenced in Paragraph 2 above, the names of
12 certain minor league players were replaced with eBis identifiers. All such players signed a Minor
13 League Uniform Player’s Contract (“UPC”) to play minor league baseball for the Club, and the
14 UPCs reflect the salary rate to be paid to such players during the championship season. All such
15 players were paid in accordance with their UPCs, and the records of their salary payments are
16 reflected on the payroll records produced by the Club and referenced in Paragraph 2 above.

17 4. Based on my review of the payroll records referenced in Paragraph 2 above, all
18 minor league baseball players who played for the Club during the 2018 and/or 2019 championship
19 seasons were compensated at a rate of at least two-hundred and ninety dollars (\$290) per week
20 during the championship season.

21 5. In 2020, due to the COVID-19 pandemic, no minor league championship season
22 was held. However, the Club compensated all minor league baseball players who were signed to
23 UPCs with the Club in 2020 with an allowance of at least four hundred dollars (\$400) per week at
24 least during the period that would have comprised the 2020 championship season.

25 6. The Club has also compensated minor league baseball players who have signed
26 UPCs with and played for the Club during the 2021 championship season at a salary of at least
27

1 four hundred dollars (\$400) per week during the 2021 championship season.

2 I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th
3 day of September, 2021.

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5 ADAM TYHURST

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